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May 1, 2018

BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lawson, et al., v. Rubin, et al., Case No.: 17 CV 6404 (BMC)

Dear Judge Cogan:

This law firm represents Jennifer Powers. I write on behalf of all the remaining parties in the case regarding new stipulated proposed deadlines in light of the Court's decision on the motions to dismiss, issued on April 29, 2018.

The parties respectfully propose the following new deadlines:

Defendants' answers to the amended complaint to be efiled	June 13, 2018
<i>Discovery schedule:</i>	
Service of initial discovery demands, including document demands, interrogatories, and requests to admit.	May 15, 2018
Service of responses and objections to initial discovery demands. Production of all documents on this date.	June 15, 2018
Final date for fact depositions	September 26, 2018
Close of fact discovery	October 16, 2018
Submission of expert reports	November 6, 2018
Final date for expert depositions	November 27, 2018
Close of expert discovery	December 18, 2018

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeffrey M. Eilender".

Jeffrey M. Eilender

Copies To:

All counsel of record